



Emma Gilmore  
Partner

December 8, 2020

**BY ECF**

The Honorable Michael A. Hammer  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: ***Karimi v. Deutsche Bank Aktiengesellschaft, et al.***,  
**Case No. 20-CV-08978-ES-MAH**

Dear Judge Hammer:

We represent Plaintiff Ali Karimi and write on behalf of all parties in the above-referenced action (the “Action”). In accordance with the Court’s Order entered November 12, 2020 (Dkt. No. 24), the parties provide this joint letter regarding the status of the Action.

The Action is a putative securities class action, alleging violations of the federal securities laws by the Defendants on behalf of a class consisting of all persons or entities who acquired the securities of Deutsche Bank Aktiengesellschaft between November 7, 2017 and July 6, 2020, both dates inclusive (the “Class”). The Action is governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 *et seq.* (the “PSLRA”), including provisions directing the appointment of a Lead Plaintiff and staying discovery. Pursuant to the PSLRA, any member of the putative Class wishing to seek appointment as Lead Plaintiff in the Action was required to so move the Court on or before September 14, 2020. Two movants filed motions on the statutory deadline: (1) Yun Wang (“Wang”) (Dkt. No. 18); and (2) Srikalahasti Vagvala (“Vagvala”) (Dkt. No. 17). On September 23, 2020, Vagvala filed a notice of withdrawal of his motion. Dkt. No. 19. Accordingly, Wang’s motion is uncontested and remains pending as of the time of this submission.

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On July 31, 2020, the parties jointly submitted a letter to the Court seeking entry of a schedule adjourning Defendants' obligation to respond to the Complaint in the Action until after the Court has appointed a Lead Plaintiff and Lead Plaintiff has filed an Amended Complaint. On August 3, 2020, the Court entered an Order providing, in relevant part, that: (1) Lead Plaintiff's Amended Complaint shall be filed within 30 days after the Court's appointment of Lead Plaintiff and Lead Counsel; (2) Defendants' deadline to respond to the Amended Complaint shall be 30 days after the filing of the Amended Complaint; (3) Lead Plaintiff's opposition to any motion(s) to dismiss by Defendants shall be filed within 30 days after the filing of Defendants' motion to dismiss; and (4) Defendants' reply thereto shall be filed within 15 days thereafter. Given the upcoming holidays, the parties have agreed, subject to the Court's order, that Plaintiff's Amended Complaint be filed on the later of 30 days after the Court's appointment of Lead Plaintiff and Lead Counsel or January 29, 2021.

In light of the pending, unopposed motion for appointment as Lead Plaintiff as well as the stay of discovery in this action, the parties respectfully submit that a conference would be premature at this time.

This is the parties' first request for an adjournment of a conference.

Respectfully submitted,

s/ Emma Gilmore

Emma Gilmore (Admitted Pro Hac Vice)

cc: All Counsel (by ECF)